

# Exhibit 6

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

MacLean-Fogg Company,

Plaintiff,

v.

Eaton Corporation,

Defendant.

Civil Action No. 2:07-cv-00472-LED  
(Judge Davis)

**MACLEAN-FOGG'S SUPPLEMENTAL DISCLOSURE OF ASSERTED CLAIMS  
AND INFRINGEMENT CONTENTIONS OF U.S. PATENT NO. 7,281,329  
PURSUANT TO P.R. 3-1**

Plaintiff, MacLean-Fogg Company, hereby discloses its asserted claims and infringement contentions to Defendant, Eaton Corporation, pursuant to P.R. 3-1.

In the chart below, MacLean-Fogg has identified the asserted claims of U.S. Patent No. 7,281,329 pursuant to P.R. 3-1(a), the accused products pursuant to P.R. 3-1(b), and the priority date of U.S. Patent No. 7,281,329 pursuant to P.R. 3-1(e). Specifically, photographs 1-16 represent components of Eaton Part No. 328347.

Pursuant to P.R. 3-1(c), a separate claim analysis is attached hereto at Exhibit 1 specifically identifying where each element of each asserted claim of U.S. Patent No. 7,281,329 is found within the accused products. For reference, the bracketed numbers corresponding to the labeled numbers on the photographs of Exhibit 2 have been added to the claim analysis of Exhibit 1. Where appropriate, text is used to label the photographs with various claim elements as well.

Pursuant to P.R. 3-1(d), MacLean-Fogg contends that all of the claim elements are literally present in the accused products. However, MacLean-Fogg reserves the right to assert infringement under the doctrine of equivalents in response to Eaton's non-infringement positions.

<b>U.S. Patent Number 7,281,329</b>	
<b>Priority Date of Claims: 18 Oct 2002</b>	
<b>Claims Infringed</b>	<b>Accused Product(s)</b>
1	Eaton Part No. 328347
5	Eaton Part No. 328347
6	Eaton Part No. 328347
7	Eaton Part No. 328347
8	Eaton Part No. 328347
13	Eaton Part No. 328347
14	Eaton Part No. 328347
15	Eaton Part No. 328347
16	Eaton Part No. 328347
17	Eaton Part No. 328347
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31	Eaton Part No. 328347
32	Eaton Part No. 328347
33	Eaton Part No. 328347
34	Eaton Part No. 328347
35	Eaton Part No. 328347
36	Eaton Part No. 328347
38	Eaton Part No. 328347
39	Eaton Part No. 328347
40	Eaton Part No. 328347
41	Eaton Part No. 328347
42	Eaton Part No. 328347
43	Eaton Part No. 328347
44	Eaton Part No. 328347
45	Eaton Part No. 328347
46	Eaton Part No. 328347

<b>U.S. Patent Number 7,281,329</b> <b>Priority Date of Claims: 18 Oct 2002</b>	
<b>Claims Infringed</b>	<b>Accused Product(s)</b>
47	Eaton Part No. 328347

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**CERTIFICATE OF SERVICE**

I hereby certify that the following counsel of record who have consented to electronic service have been served with a copy of this document through the Court's CM/ECF system.

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/s/ Richard E. Stanley, Jr.

# **Exhibit 1**

**U.S. Patent No. 7,281,329**

1. A method of fabricating a roller follower assembly, comprising the steps of:
  - a) fabricating a roller follower body [10], comprising the steps of:
    - i) providing a first rod;
    - ii) cold forming a first roller cavity [30] into the first rod to provide the first roller cavity [30] with a first inner roller surface [50];
    - iii) enclosing at least a portion of the first roller cavity [30] within an outer roller surface [80];
    - iv) configuring the first inner roller surface [50] to house a roller [90];
    - v) cold forming a second roller cavity [31] into the first rod to provide the second roller cavity [31] with a second inner roller surface [70];
    - vi) enclosing at least a portion of the second roller cavity [31] within the outer roller surface [80];
    - vii) configuring the second inner roller surface [70] to house a leakdown plunger [210];
  - b) fabricating the leakdown plunger [210], comprising the steps of:
    - i) providing a second rod;
    - ii) cold forming an inner plunger surface [250] into the second rod to provide a chamber [239];
    - iii) cold forming a first plunger opening [231] into the second rod;
    - iv) configuring the first plunger opening [231] to accommodate a valve insert [243];
    - v) cold forming a second plunger opening [232] into the second rod;
    - vi) configuring the second plunger opening to cooperate with a socket [310];
    - vii) fabricating an outer plunger surface [280];
    - viii) configuring the outer plunger surface [280] for insertion into the roller follower body [10];
    - ix) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280];
    - x) configuring the inner plunger surface [250] to define a chamber [239];
  - c) fabricating the socket [310], comprising the steps of:
    - i) fabricating a first socket surface [331];
    - ii) configuring the first socket surface [331] to accommodate a push rod;
    - iii) fabricating a second socket surface [332];
    - iv) configuring the second socket surface [332] to cooperate with the leakdown plunger [210];
    - v) fabricating an outer socket surface [340];
    - vi) fabricating a passage [337]; and
  - d) at least one of the first roller cavity [30], the second roller cavity [31], the first plunger opening [231], the second plunger opening [232], the outer plunger surface [280], the inner plunger surface [250], the first socket surface [331], the second socket surface [332], the outer socket surface [340], and the passage [337] is fabricated at least in part through forging.

5. A method of fabricating a roller follower assembly, comprising the steps of:

- a) fabricating a roller follower body [10], comprising the steps of:
  - i) cold forming a first roller cavity [30];
  - ii) enclosing at least a portion of the first roller cavity [30] within an outer roller surface [80];
  - iii) providing the first roller cavity [30] with a first inner roller surface [50];
  - iv) configuring the first inner roller surface [50] to accommodate a cylindrical insert [90];
  - v) cold forming a second roller cavity [31];
  - vi) enclosing at least a portion of the second roller cavity [31] within the outer roller surface [80];
  - vii) machining, at least in part, the second roller cavity [31] to provide a second inner roller surface [70];
  - viii) configuring the second inner roller surface [70] to house a leakdown plunger [210];
  - ix) machining, at least in part, the outer roller surface [80] to provide a generally cylindrical roller surface [81] located adjacent to a frusto-conical roller surface [83];
- b) fabricating the leakdown plunger [210], comprising the steps of:
  - i) cold forming a first plunger opening [231];
  - ii) configuring the first plunger opening [231] to accommodate a valve insert [243];
  - iii) cold forming a second plunger opening [232];
  - iv) configuring the second plunger opening [232] to cooperate with a socket [310];
  - v) cold forming, at least in part, an outer plunger surface [280];
  - vi) machining, at least in part, the outer plunger surface [280] for insertion into the roller follower body [10];
  - vii) enclosing at least a portion of an inner plunger surface [250] within the outer plunger surface [280];
  - viii) configuring the inner plunger surface [250] to define a chamber [239];
- c) fabricating the socket [310], comprising the steps of:
  - i) cold forming a first socket surface [331];
  - ii) configuring the first socket surface [331] to cooperate with a push rod;
  - iii) cold forming a second socket surface [332];
  - iv) configuring the second socket surface [332] to cooperate with the leakdown plunger [210];
  - v) fabricating an outer socket surface [340];
  - vi) configuring the outer socket surface [340] to cooperate with the leakdown plunger [210]; and
  - vii) fabricating a passage [337].

6. The method of claim 5, wherein at least one of the first inner roller surface [50], and

the second inner roller surface [70] is provided at least in part through forging.

7. The method of claim 5, wherein at least one of the steps of configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to accommodate the push rod, and configuring the second socket surface [332] to cooperate with the leakdown plunger [210] is accomplished at least in part through cold forming.

8. The method of claim 5, wherein at least one of the first roller cavity [30], the first inner roller surface [50], and the second inner roller surface [70] is provided at least in part through forging and wherein at least one of the steps of: enclosing at least a portion of the first roller cavity [50] within the outer roller surface [80], configuring the first inner roller surface [50] to house the cylindrical insert [90], enclosing at least a portion of the second roller cavity [31] within the outer roller surface [80], configuring the second inner roller surface [70] to house the leakdown plunger [210], configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the leakdown plunger [210] is accomplished at least in part through forging.

13. A method of fabricating a roller follower assembly, comprising the steps of:

- a) fabricating a roller follower body [10], comprising the steps of:
  - i) providing a forgeable material;
  - ii) cold forming the forgeable material so that the forgeable material is provided with a first end and a second end;
  - iii) cold forming the forgeable material, at least in part, to provide a plurality of roller walls [51, 53] at the first end;
  - iv) cold forming the forgeable material to provide, at least in part, an outer roller surface [80];
  - v) configuring the roller walls [51, 53] to accommodate a roller [90];
  - vi) cold forming a roller cavity [31] into the second end of the forgeable material;
  - vii) enclosing at least a portion of the roller cavity [31] within the outer roller surface [80];
  - viii) machining, at least in part, the roller cavity [31] to provide an inner roller surface [70];
  - ix) configuring the inner roller surface [70] to house a leakdown plunger [210];

- x) machining, at least in part, the outer roller surface [80] to provide a cylindrical roller surface [81];
- b) fabricating the leakdown plunger [210], comprising the steps of:
  - i) cold forming a first plunger opening [231];
  - ii) configuring the first plunger opening [231] to accommodate a valve insert [243];
  - iii) cold forming a second plunger opening [232];
  - iv) configuring the second plunger opening [232] to cooperate with a socket [310];
  - v) cold forming, at least in part, an outer plunger surface [280];
  - vi) configuring the outer plunger surface [280] for insertion into the inner roller surface [70] of the roller follower body [10];
  - vii) cold forming, at least in part, an inner plunger surface [250] within the outer plunger surface [280];
  - viii) configuring the inner plunger surface [250] to define a chamber [239];
- c) fabricating the socket [310], comprising the steps of:
  - i) cold forming a first socket surface [331];
  - ii) configuring the first socket surface [331] to cooperate with a push rod;
  - iii) cold forming a second socket surface [332];
  - iv) configuring the second socket surface [332] to cooperate with the leakdown plunger [210];
  - v) cold forming an outer socket surface [340];
  - vi) configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10]; and
  - vii) fabricating a passage [337].

14. The method of claim 13, wherein at least one of the first inner roller surface [50] and the second inner roller surface [70] is provided at least in part through forging.

15. The method of claim 13, wherein at least one of the steps of: enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the roller walls [51, 53] to accommodate the roller [90], and configuring the inner roller surface [70] to house the leak down plunger [210] is accomplished at least in part through forging.

16. The method of claim 13, wherein the inner roller surface [70] is provided at least in part through forging and wherein at least one of the steps of: enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the inner roller surface [70] to house the leakdown plunger [210], and configuring the roller walls [51, 53] to accommodate the roller [90] is accomplished at least in part through forging.

17. A method of fabricating a roller follower assembly, comprising the steps of:

- a) fabricating a roller follower body [10], comprising the steps of:

- i) providing a first rod of forgeable material;
- ii) cold forming the first rod to provide a first end and a second end;
- iii) cold forming the first end of the first rod to provide a plurality of roller walls [51, 53];
- iv) configuring the roller walls [51, 53] to house a roller [90];
- v) cold forming a roller cavity [31] into the second end of the first rod of forgeable material;
- vi) enclosing at least a portion of the roller cavity [31] within an outer roller surface [80];
- vii) machining, at least in part, the roller cavity [31] to provide an inner roller surface [70];
- viii) configuring the inner roller surface [70] to accommodate a leakdown plunger [210];

b) fabricating the leakdown plunger [210], comprising the steps of:

- i) providing a second rod of forgeable material;
- ii) cold forming a first plunger opening [231] into the second rod;
- iii) configuring the first plunger opening [231] to accommodate a valve insert [243];
- iv) cold forming a second plunger opening [232] into the second rod;
- v) cold forming, at least in part, an inner plunger surface [250] into the second rod;
- vi) configuring the second plunger opening [232] to cooperate with a socket [310];
- vii) fabricating an outer plunger surface [280];
- viii) configuring the outer plunger surface [280] for insertion into the roller follower body [10];
- ix) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280];
- x) configuring the inner plunger surface [250] to define a chamber [239];

c) fabricating the socket [310], comprising the steps of:

- i) providing a third rod of forgeable material;
- ii) cold forming a first socket surface [331] into the third rod so that the first socket surface [331] cooperates with a push rod;
- iii) cold forming a second socket surface [332] into the third rod so that the second socket surface [332] cooperates with the leakdown plunger [210];
- iv) cold forming an outer socket surface [340] so that the outer socket surface [340] cooperates with the inner roller surface [70] of the roller follower body [10];
- v) heat treating the socket [310]; and
- vi) fabricating a passage [337].

18. The method of claim 17, wherein at least one of the steps of: configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion

of the inner plunger surface [250] within the outer plunger surface [280], and configuring the inner plunger surface [250] to define the chamber [239] is accomplished at least in part through forging.

19. A method of fabricating a roller follower assembly, comprising the steps of:

- a) fabricating a roller follower body [10], comprising the steps of:
  - i) providing a first rod of forgeable material;
  - ii) cold forming the first rod to provide a first end and a second end;
  - iii) cold forming the first end of the first rod to provide a plurality of roller walls [51, 53];
  - iv) configuring the roller walls [51, 53] to house a cylindrical insert [90];
  - v) cold forming a roller cavity [31], at least in part, into the second end of the first rod of forgeable material;
  - vi) enclosing at least a portion of the roller cavity [31] within an outer roller surface [80];
  - vii) machining, at least in part, the roller cavity [31] to provide an inner roller surface [70] that is configured to accommodate a leakdown plunger [210];
  - viii) cold forming, at least in part, an undercut surface [82] into the outer roller surface [80] so that the undercut surface [82] is located at the second end of the first rod;
- b) fabricating the leakdown plunger [210], comprising the steps of:
  - i) providing a second rod of forgeable material;
  - ii) cold forming a first plunger opening [231] into the second rod;
  - iii) configuring the first plunger opening [231] to accommodate a valve insert [243];
  - iv) cold forming a second plunger opening [232] into the second rod;
  - v) cold forming, at least in part, an inner plunger surface [250] into the second rod;
  - vi) configuring the second plunger opening [232] to cooperate with a socket [310];
  - vii) fabricating an outer plunger surface [280];
  - viii) configuring the outer plunger surface [280] for insertion into the roller follower body [10];
  - ix) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280];
  - x) configuring the inner plunger surface [250] to define a chamber [239];
- c) fabricating the socket [310], comprising the steps of:
  - i) providing a third rod of forgeable material;
  - ii) cold forming a first socket surface [331] into the third rod so that the first socket surface [331] cooperates with a push rod;
  - iii) cold forming a second socket surface [332] into the third rod so that the second socket surface [332] cooperates with the leakdown plunger [210];
  - iv) cold forming the third rod to provide an outer socket surface [340]; and
  - v) fabricating a passage [337].

20. The method of claim 19, wherein at least one of the steps of: configuring the first socket surface [331] to accommodate the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the inner roller surface [70] is accomplished at least in part through forging.

21. A method of fabricating a roller follower assembly, comprising the steps of:

- a) fabricating a roller follower body [10], comprising the steps of:
  - i) providing a first rod of forgeable material;
  - ii) cold forming the first rod to provide a first end and a second end;
  - iii) cold forming the first end of the first rod to provide a plurality of roller walls [51, 53];
  - iv) configuring the roller walls [51, 53] to house a roller [90];
  - v) cold forming a roller cavity [31] into the second end of the first rod of forgeable material;
  - vi) enclosing at least a portion of the roller cavity [31] within an outer roller surface [80];
  - vii) machining, at least in part, the roller cavity [31] to provide an inner roller surface [70];
  - viii) configuring the inner roller surface [70] to accommodate a leakdown plunger [210];
  - ix) cold forming, at least in part, a well [462] into the inner roller surface [70];
- b) fabricating the leakdown plunger [210], comprising the steps of:
  - i) providing a second rod of forgeable material;
  - ii) cold forming a first plunger opening [231] into the second rod;
  - iii) configuring the first plunger opening [231] to accommodate a valve insert [243];
  - iv) cold forming a second plunger opening [232] into the second rod;
  - v) cold forming, at least in part, an inner plunger surface [250] into the second rod;
  - vi) configuring the second plunger opening [232] to cooperate with a socket [310];
  - vii) fabricating an outer plunger surface [280];
  - viii) configuring the outer plunger surface [280] for insertion into the roller follower body [10];
  - ix) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280];
  - x) configuring the inner plunger surface [250] to define a chamber [239];
- c) fabricating the socket [310], comprising the steps of:
  - i) providing a third rod of forgeable material;
  - ii) cold forming a first socket surface [331] into the third rod so that the first socket surface [331] cooperates with a push rod;
  - iii) cold forming a second socket surface [332] into the third rod so that the second socket surface [332] cooperates with the leakdown plunger

[210];

iv) cold forming an outer socket surface [340] so that the outer socket surface [340] cooperates with the inner roller surface [70] of the roller follower body [10]; and  
v) fabricating a passage [337].

22. The method of claim 21, further comprising the step of: heat treating any one of the roller follower body [10], the leakdown plunger [210], and the socket [310].

23. The method of claim 21, wherein the inner roller surface [70] is provided at least in part through machining.

24. The method of claim 21, wherein at least one of the steps of:

(a) enclosing at least a portion of the roller cavity [31] within the outer roller surface [80];  
(b) configuring the inner roller surface [70] to accommodate the socket [310], the leakdown plunger [210], and the valve insert [243];  
(c) configuring the plurality of roller walls [51, 53] to accommodate the roller [90];  
(d) configuring the first plunger opening [231] to accommodate the valve insert [243];  
(e) configuring the second plunger opening [232] to cooperate with the socket [310];  
(f) configuring the outer plunger surface [280] for insertion into the roller follower body [10];  
(g) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280];  
(h) configuring the inner plunger surface [250] to define the chamber [239];  
(i) configuring the first socket surface [331] to cooperate with the push rod;  
(j) configuring the second socket surface [332] to cooperate with the leakdown plunger [210]; and  
(k) configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10] is accomplished at least in part through machining.

25. The method of claim 21, wherein the inner roller surface [70] is provided at least in part through machining and wherein at least one of the steps of:

(a) enclosing at least a portion of the roller cavity [31] within the outer roller surface [80],  
(b) configuring the plurality of roller walls [51, 53] to house the roller,  
(c) configuring the first plunger opening [231] to accommodate the valve insert [243],  
(d) configuring the second plunger opening [232] to cooperate with the socket [310],  
(e) configuring the outer plunger surface [280] for insertion into the roller follower body [10],  
(f) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280],  
(g) configuring the inner plunger surface [250] to define the chamber [239],  
(h) configuring the first socket surface [331] to cooperate with the push rod;  
(i) configuring the second socket surface [332] to cooperate with the leakdown plunger [210]; and  
(j) configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10] is accomplished at least in part through machining.

26. The method of claim 21, wherein at least one of the inner roller surface [70] and the plurality of roller walls [51, 53] is provided at least in part through forging.

27. The method of claim 21, wherein at least one of the steps of: enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the second plunger opening [232] to cooperate with the socket [310], the leakdown plunger [210], and the valve insert [243], configuring the plurality of roller walls [51, 53] to house the roller [90], configuring the inner roller surface [70] to accommodate the leakdown plunger [210], configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10] is accomplished at least in part through cold forming.

28. The method of claim 21, wherein the inner roller surface [70], is provided at least in part through cold forming and wherein at least one of the steps of: enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the inner roller surface [70] to accommodate the socket [310], the leakdown plunger [210], and the valve insert [243], configuring the plurality of walls [51, 53] to house the roller [90], configuring the inner roller surface [70] to accommodate the leakdown plunger [210], configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10] is accomplished at least in part through machining.

29. The method of claim 21, wherein the inner roller surface [70] is provided at least in part through machining and cold forming.

30. The method of claim 21, wherein at least one of the steps of: enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the roller adjuster surface [70] to accommodate the socket [310], the leakdown plunger [210], and the valve insert [243], enclosing at least a portion of the roller walls [51, 53] within the outer roller surface [80], configuring the plurality of walls [51, 53] to house the roller [90], configuring the first plunger opening [231] to accommodate the valve insert [243],

configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10] is accomplished at least in part through machining and forging.

31. The method of claim 21, wherein the inner roller surface [70] is provided at least in part through cold forming and machining and wherein at least one of the steps of: enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the inner roller surface [70] to accommodate the socket [310], the leakdown plunger [210], and the valve insert [243], enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the plurality of walls [51, 53] to house the roller [90], configuring the inner roller surface [70] to accommodate the leakdown plunger [210], configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10] is accomplished at least in part through machining and forging.

32. The method of claim 21, wherein the inner roller surface [70] is provided at least in part through forging and wherein at least one of the steps of: configuring the inner roller surface [70] to accommodate the socket [310], the leakdown plunger [210], and the valve insert [243], enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the plurality of roller walls [51, 53] to house the roller [90], enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the inner roller surface [70] to house the leakdown plunger [210], configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the roller adjuster surface [70] of the roller follower body [10] is accomplished at least in part through machining.

33. The method of claim 21, wherein the inner roller surface [70] is provided at least in part through machining and wherein at least one of the steps of: configuring the inner roller surface [70] to accommodate the socket [310], the leakdown plunger [210], and the valve insert [243], enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the plurality of roller walls [51, 53] to house the roller [90], enclosing at least a portion of the roller walls [51, 53] within the outer roller surface [80], configuring the inner roller surface [70] to house the leakdown plunger [210], configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10] is accomplished at least in part through forging.

34. The method of claim 21, wherein the inner roller surface [70] is provided at least in part through forging and machining and wherein at least one of the steps of: configuring the plurality of roller walls [51, 53] to house the roller [90], configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, and configuring the second socket surface [332] to cooperate with the leakdown plunger [210] is accomplished at least in part through machining.

35. The method of claim 21, wherein the inner roller surface [70] is provided at least in part through forging and machining and wherein at least one of the steps of: enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the plurality of roller walls [51, 53] to house the roller [90], enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the inner roller surface [70] to accommodate the leakdown plunger [210], configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10] is accomplished at least in part through forging.

36. The method of claim 21, wherein the inner roller surface [70] is provided at least in

part through forging and wherein at least one of the steps of: enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the inner roller surface [70] to accommodate the socket [310], the leakdown plunger [210], and the valve insert [243], enclosing at least a portion of the roller walls [51, 53] within the outer roller surface [80], configuring the roller walls [51, 53] to house the roller [90], enclosing at least a portion of the roller cavity [31] within the outer roller surface [80], configuring the inner roller surface [70] to house the leakdown plunger [210], configuring the first plunger opening [231] to accommodate the valve insert [243], configuring the second plunger opening [232] to cooperate with the socket [310], configuring the outer plunger surface [280] for insertion into the roller follower body [10], enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], configuring the inner plunger surface [250] to define the chamber [239], configuring the first socket surface [331] to cooperate with the push rod, configuring the second socket surface [332] to cooperate with the leakdown plunger [210], and configuring the outer socket surface [340] to cooperate with the inner roller surface [70] of the roller follower body [10] is accomplished at least in part through machining and forging.

38. A method of fabricating a roller follower assembly, comprising the steps of:

- a) fabricating a roller follower body [10], comprising the steps of:
  - i) providing a first rod of forgeable material;
  - ii) cold forming the first rod to provide a first end and a second end;
  - iii) cold forming the first end of the first rod to provide a plurality of roller walls [51,53] so that the roller walls [51, 53] accommodate a roller [90];
  - iv) cold forming a roller cavity [31] into the second end of the first rod of forgeable material;
  - v) enclosing at least a portion of the roller cavity [31] within an outer roller surface [80];
  - vi) machining, at least in part, the roller cavity [31] to provide an inner roller surface [70];
  - vii) configuring the inner roller surface [70] to accommodate a leakdown plunger [210];
  - viii) cold forming, at least in part, a well [462] into the inner roller surface [70]
  - ix) cold forming, at least in part, an undercut surface [82] into the outer roller surface [80] so that the undercut surface [82] is located at the second end of the first rod;
- b) fabricating the leakdown plunger [210], comprising the steps of:
  - i) providing a second rod of forgeable material;
  - ii) cold forming a first plunger opening [231] into the second rod;
  - iii) configuring the first plunger opening [231] to accommodate a valve insert [243];
  - iv) cold forming a second plunger opening [232] into the second rod;
  - v) cold forming, at least in part, an inner plunger surface [250] into the second rod;
  - vi) configuring the second plunger opening [232] to cooperate with a socket [310];

- vii) fabricating an outer plunger surface [280];
- viii) configuring the outer plunger surface [280] for insertion into the roller follower body [10];
- ix) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280];
- x) configuring the inner plunger surface [250] to define a chamber [239];

c) fabricating the socket [310], comprising the steps of:

- i) providing a third rod of forgeable material;
- ii) cold forming a first socket surface [331] into the third rod so that the first socket surface [331] cooperates with a push rod;
- iii) cold forming a second socket surface [332] into the third rod so that the second socket surface [332] cooperates with the leakdown plunger [210];
- iv) cold forming an outer socket surface [340] so that the outer socket surface [340] cooperates with the inner roller surface [70] of the roller follower body [10]; and
- v) fabricating a passage [337].

39. The method of claim 38, wherein at least one of the well [462], the undercut surface [82], the first plunger opening [231], the second plunger opening [232], the outer plunger surface [280], the inner plunger surface [250], the first socket surface [331], the second socket surface [332], and the outer socket surface [340], is provided or fabricated at least in part through machining.

40. The method of claim 38, wherein at least one of the steps of:

- (a) enclosing at least a portion of the roller cavity [31] within the outer roller surface [80];
- (b) configuring the inner roller surface [70] to accommodate the leakdown plunger [210];
- (c) configuring the first plunger opening [231] to accommodate the valve insert [243];
- (d) configuring the second plunger opening [232] to cooperate with the socket [310];
- (e) configuring the outer plunger surface [280] for insertion into the roller follower body [10];
- (f) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], and
- (g) configuring the inner plunger surface [250] to define the chamber [239] is accomplished at least in part through machining.

41. The method of claim 38, wherein at least one of the well [462], the undercut surface [82], the roller cavity [31], the first plunger opening [231], the second plunger opening [232], the outer plunger surface [280], the inner plunger surface [250], the first socket surface [331], the second socket surface [332], and the outer socket surface [340] is provided or fabricated at least in part through machining and wherein at least one of the steps of:

- (a) enclosing at least a portion of the roller cavity [31] within the outer roller surface [80];
- (b) configuring the inner roller surface [70] to accommodate the leakdown plunger [210];
- (c) configuring the first plunger opening [231] to accommodate the valve insert [243];
- (d) configuring the second plunger opening [232] to cooperate with the socket [310];

- (e) configuring the outer plunger surface [280] for insertion into the roller follower body [10];
- (f) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280]; and
- (g) configuring the inner plunger surface [250] to define the chamber [239] is accomplished at least in part through machining.

42. The method of claim 38, wherein at least one of the roller cavity [31], inner roller surface [70], the outer plunger surface [280], the inner plunger surface [250], and the passage [337] is provided at least in part through cold forming.

43. The method of claim 38, wherein at least one of the steps of:

- (a) enclosing at least a portion of the roller cavity [31] within the outer roller surface [80];
- (b) configuring the inner roller surface [70] to accommodate the leakdown plunger [210];
- (c) configuring the first plunger opening [231] to accommodate the valve insert [243];
- (d) configuring the second plunger opening [232] to cooperate with the socket [310];
- (e) configuring the outer plunger surface [280] for insertion into the roller follower body [10];
- (f) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280]; and
- (g) configuring the inner plunger surface [250] to define the chamber [239] is accomplished at least in part through cold forming.

44. The method of claim 38, wherein at least one of the roller cavity [31], the outer roller surface [80], the outer plunger surface [280], and the passage [337] is provided at least in part through cold forming and wherein at least one of the steps of:

- (a) enclosing at least a portion of the roller cavity [31] within the outer roller surface [80];
- (b) configuring the inner roller surface [70] to accommodate the leakdown plunger [210];
- (c) configuring the first plunger opening [231] to accommodate the valve insert [243];
- (d) configuring the second plunger opening [232] to cooperate with the socket [310];
- (e) configuring the outer plunger surface [280] for insertion into the roller follower body [10];
- (f) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280]; and
- (g) configuring the inner plunger surface [250] to define the chamber [239] is accomplished at least in part through cold forming.

45. The method of claim 38, wherein at least one of the well [462], the undercut surface [82], the roller cavity [31], the first plunger opening [231], the second plunger opening [232], the outer plunger surface [280], the inner plunger surface [250], the first socket surface [331], the second socket surface [332], the outer socket surface [340], the passage [337], and the inner roller surface [70] is provided or fabricated at least in part through machining and cold forming.

46. The method of claim 38, wherein at least one of the steps of:

- (a) enclosing at least a portion of the roller cavity [31] within the outer roller surface [80],

- (b) configuring the inner roller surface [70] to accommodate the leakdown plunger [210],
- (c) configuring the first plunger opening [231] to accommodate the valve insert [243],
- (d) configuring the second plunger opening [232] to cooperate with the socket [310],
- (e) configuring the outer plunger surface [280] for insertion into the roller follower body [10],
- (f) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280], and
- (g) configuring the inner plunger surface [250] to define the chamber [239] is accomplished at least in part through machining and cold forming.

47. The method of claim 38, wherein at least one of the well [462], the undercut surface [82], the roller cavity [31], the first plunger opening [231], the second plunger opening [232], the outer plunger surface [280], the inner plunger surface [250], the first socket surface [331], the second socket surface [332], the outer socket surface [340], the passage [337], and the inner roller surface [70] is provided or fabricated at least in part through machining and cold forming and wherein at least one of the steps of:

- (a) enclosing at least a portion of the roller cavity [31] within the outer roller surface [80],
- (b) configuring the inner roller surface [70] to accommodate the socket [310] and the leakdown plunger [210],
- (c) configuring the first plunger opening [231] to accommodate the valve insert [243],
- (d) configuring the second plunger opening [232] to cooperate with the socket [310],
- (e) configuring the outer plunger surface [280] for insertion into the roller follower body [10], and
- (f) enclosing at least a portion of the inner plunger surface [250] within the outer plunger surface [280] is accomplished at least in part through machining and cold forming.

## **Exhibit 2**

Eaton Part No. 328347 – Roller



Photograph No. 1

Eaton Part No. 328347 – Socket



Photograph No. 2

Eaton Part No. 328347 – Socket



Photograph No. 3

Eaton Part No. 328347 – Socket



Photograph No. 4

## Eaton Part No. 328347 – Leakdown Plunger



Photograph No. 5

Eaton Part No. 328347 – Leakdown Plunger



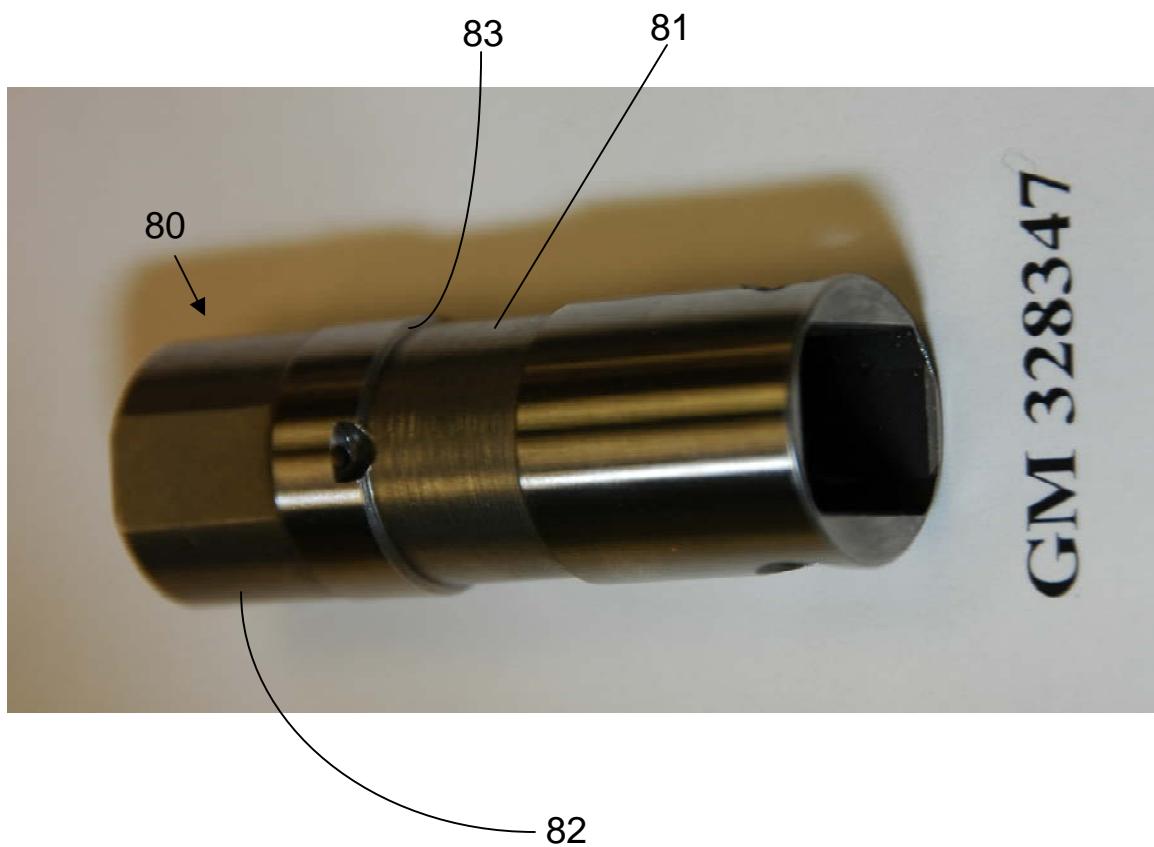
Photograph No. 6

## Eaton Part No. 328347 – Leakdown Plunger



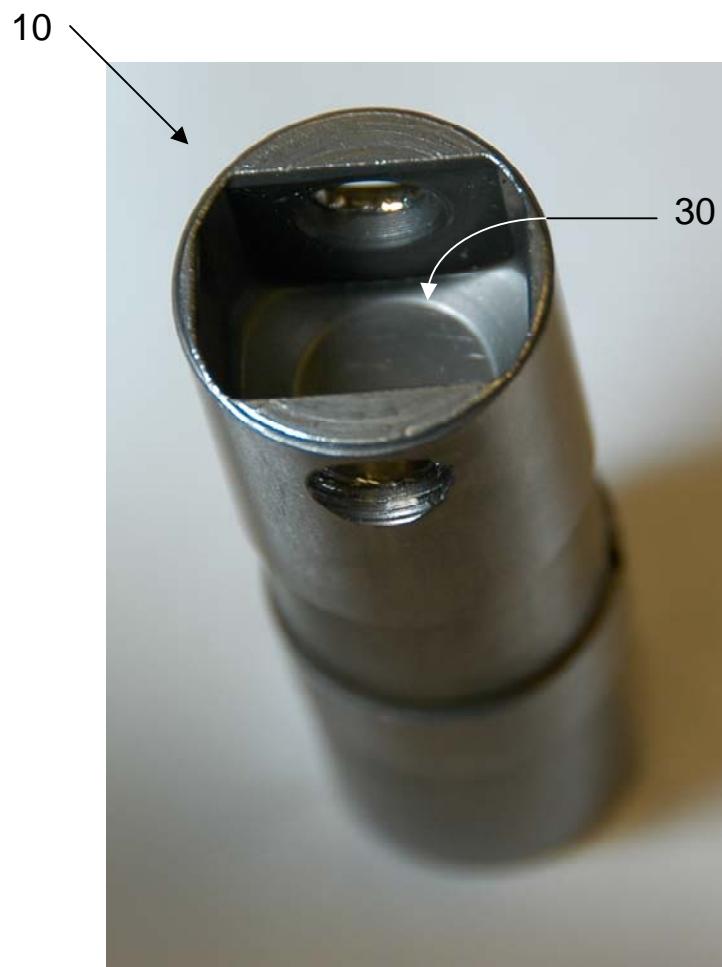
Photograph No. 7

## Eaton Part No. 328347 – Valve Lifter Body



Photograph No. 8

## Eaton Part No. 328347 – Valve Lifter Body



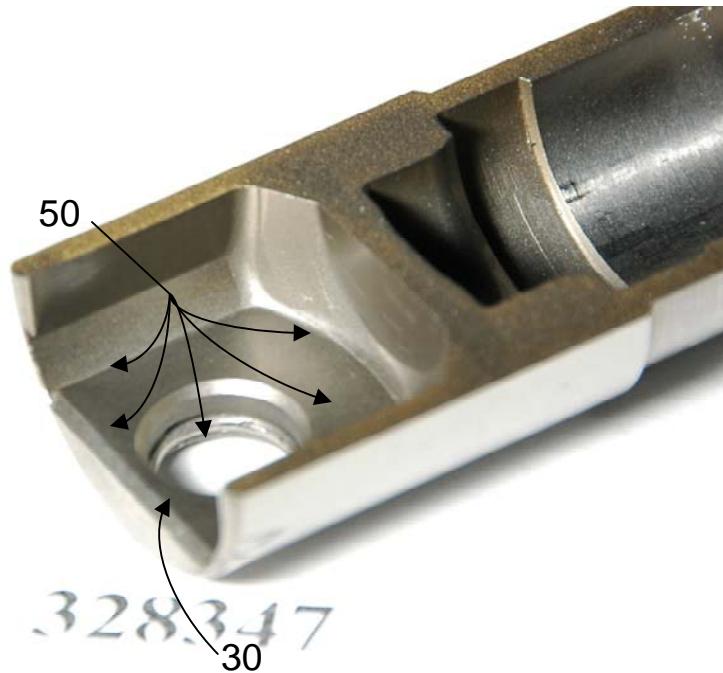
Photograph No. 9

## Eaton Part No. 328347 – Valve Lifter Body



Photograph No. 10

## Eaton Part No. 328347 – Valve Lifter Body



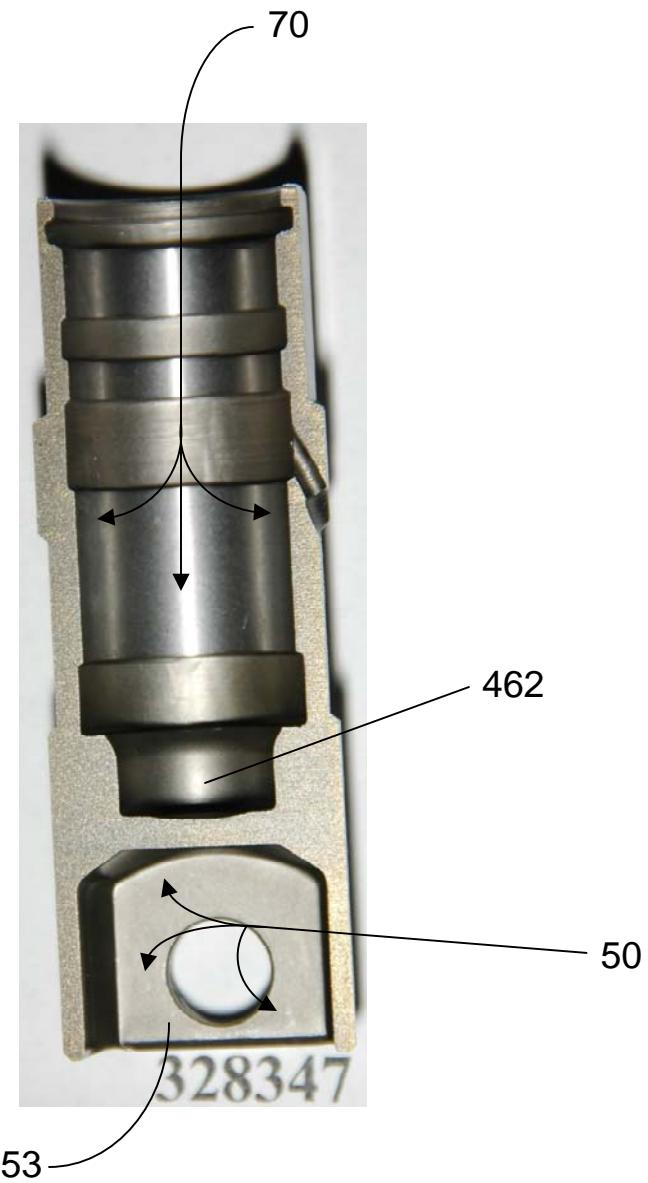
Photograph No. 11

Eaton Part No. 328347 – Valve Lifter Body



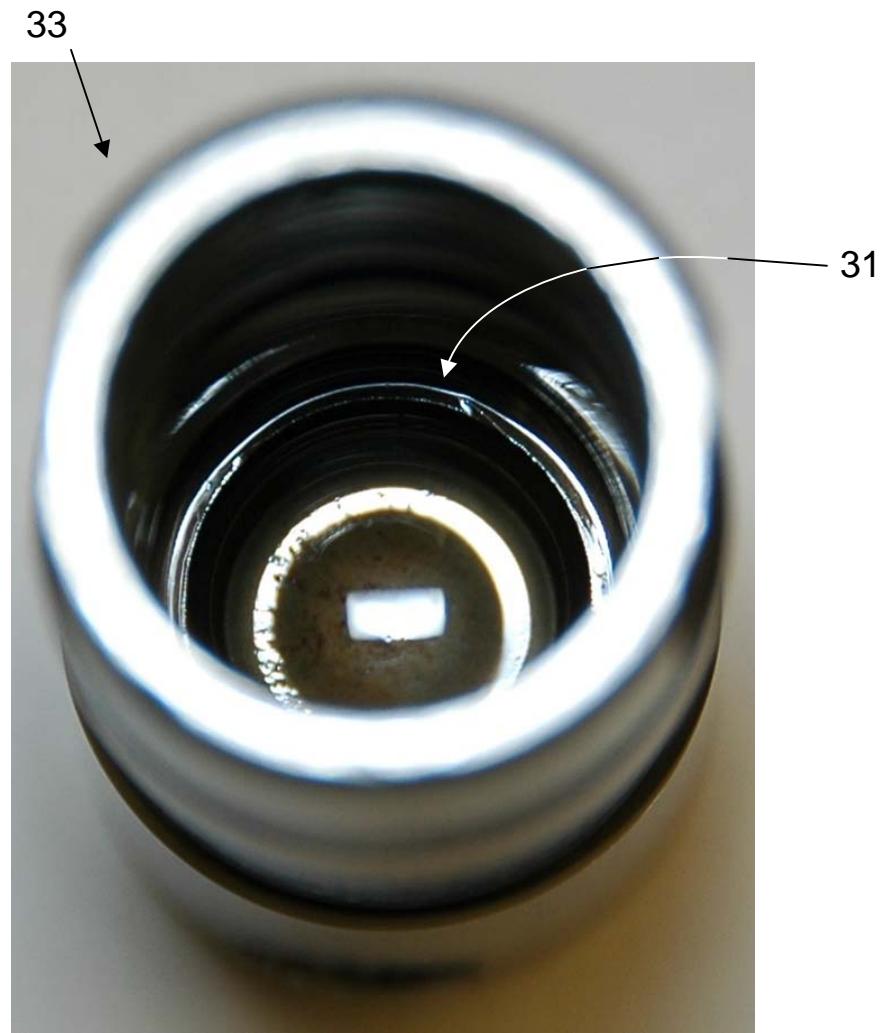
Photograph No. 12

## Eaton Part No. 328347 – Valve Lifter Body



Photograph No. 13

## Eaton Part No. 328347 – Valve Lifter Body



Photograph No. 14

## Eaton Part No. 328347 – Valve Lifter Body



Photograph No. 15

Eaton Part No. 328347 – Insert



Photograph No. 16